

**UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION**

UNITED STATES OF AMERICA)	
)	
)	Case No. 3:22-cr-00072
v.)	ALETA A. TRAUGER
)	Judge, U.S. District Court
)	
KALUM ALEXANDER)	

**KALUM ALEXANDER'S UNOPPOSED MOTION TO CONTINUE HIS
SEPTEMBER 20, 2022, TRIAL AND EXTEND THE RELATED FILING DEADLINES**

COMES now, the accused, **KALUM SHAMAR ALEXANDER**, through counsel, Assistant Federal Public Defender, Isaiah S. Gant, and moves this Honorable Court to enter an order continuing the September 20, 2022, trial of his case and extend the related filing deadlines to a date not less than sixty (60) days from the date granting this Motion. In support of the foregoing Motion, it is respectfully represented to this Honorable Court the following: On February 28, 2022, a Federal Grand Jury convened in the Middle District of Tennessee, Nashville, Tennessee, and returned a multiple-count indictment against Kalum Alexander alleging violations of federal law. (DE 1.) Mr. Alexander appeared before the Honorable Alistair E. Newbern, United States Magistrate Judge, on April 13, 2022, for an initial appearance and arraignment. Mr. Alexander,

through counsel, entered a plea of not guilty. (DE 12.) Thereafter, by order of this Court, trial in this case was scheduled to commence June 21, 2022, at 9:00 a.m. Likewise, by that same order, various filing deadlines were designated. (DE 18.) Thereafter, for good cause shown, the case was continued to September 20, 2022. (DE 22).

Mr. Alexander is currently serving a state sentence that is not scheduled to expire until August 21, 2024. By an order entered by this Honorable Court, Mr. Alexander was returned to state custody from federal custody to allow him to appear before the state Parole Board in August 2022. That parole hearing has been rescheduled for October 2022. Mr. Alexander is requesting that his September 20, 2022, trial be continued to allow him to appear before the Parole Board in October 2022.

Counsel for Mr. Alexander has conferred with counsel for the government, Assistant United States Attorney, Dwight Artis, who has granted counsel the liberty of informing the Court that the government has no opposition to the granting of this Motion.

An executed Speedy Trial Waiver prepared pursuant to the Middle District of Tennessee's *Plan for the Prompt Disposition of Criminal Cases* will be filed contemporaneously with the filing of this Motion.

WHEREFORE, for the above and foregoing reasons, it is respectfully prayed that this Honorable Court enter an order continuing the trial in this case currently scheduled to commence September 20, 2022, at 9:00 a.m., and extending the related filing deadlines to a date not less than sixty (60) days from the date granting this Motion.

Respectfully prayed and submitted,

/s/ Isaiah S. Gant
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CERTIFICATE OF SERVICE

I hereby certify that on September 14, 2022, I electronically filed the foregoing *Kalum Alexander's Unopposed Motion to Continue His September 20, 2022, Trial and Extend the Related Filing Deadlines* with the U.S. District Court Clerk by using the CM/ECF system, which will send a Notice of Electronic Filing to the following: Dwight Artis, Assistant United States Attorney, 719 Church Street, Suite 3300, Nashville, Tennessee, 37203.

/s/ Isaiah S. Gant

ISAIAH S. GANT